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ILLINOIS COMMERCE COMMISSION

STATE OF ILLINOIS
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FEB 5 2 33 PM '01

Illinois Power Company)

Proposed Vegetation Management Tariff)

Docket No. 01-0012 CHIEF CLERK'S OFFICE

VERIFIED PETITION TO INTERVENE

NOW COMES the Petitioner, IP CUSTOMERS UNITED TO SAVE OUR TREES (hereinafter, "IPCUTSOT"), through its attorney, John McMahon, of Wilkie & McMahon, and respectfully petitions the Illinois Commerce Commission (hereinafter, "Commission") for permission to intervene in the above-captioned proceeding. In support of its Petition, IPCUTSOT states as follows:

1. The Petitioner, IPCUTSOT, is an unincorporated association of Illinois Power customers residing in the Champaign-Urbana area who have joined together to seek relief as to the above-referenced proposed Vegetation Management Tariff. Its mailing address is 110 South Race Street, Urbana, Illinois, 61801. As an unincorporated association, IPCUTSOT is a person who may be permitted to intervene pursuant to 83 Ill. Adm. Code §200.40.

2. This matter involves a proposed vegetation management tariff, which would allow Illinois Power increased latitude with respect to the trimming of trees and other vegetation near its power lines.

3. The Petitioner, IPCUTSOT, has a property interest in protecting the individual trees and other vegetation on its individual members' properties as well as an aesthetic interest in trees and other vegetation in the neighborhoods surrounding its individual members' properties.

4. The Petitioner, IPCUTSOT, will be materially affected by the outcome of this proceeding.

5. The Petitioner, IPCUTSOT, requests leave to intervene, and to participate as an active party in the proceeding.


6. The Commission has authority under 220 ILCS §5/10-101 et seq. and 83 Ill. Adm. Code §200 et seq. to grant the relief requested herein.

7. The Petitioner, IPCUTSOT, agrees to accept service by electronic means.

WHEREFORE, the Petitioner IP CUSTOMERS UNITED TO SAVE OUR TREES, respectfully petitions the Commission for leave to intervene and be treated as a party in the above-captioned proceeding.

Respectfully Submitted,

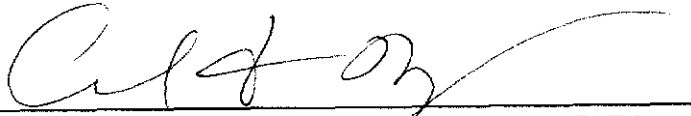
IP CUSTOMERS UNITED TO SAVE OUR TREES,
Petitioner

By: 
One of its attorneys

John McMahon
Wilkie & McMahon
8 E. Main St.
Champaign, IL 61820
(217)359-2115
(217) 359-2754 (facsimile)

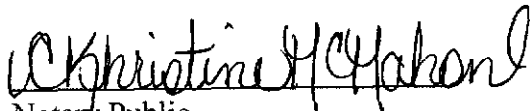
VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure of the State of Illinois, the undersigned certifies that he is an officer of the Petitioner in the foregoing proceeding, that he has read the contents of the foregoing Petition and that the statements set forth in the Petition are true and correct.



Vice Coordinator of IP CUSTOMERS UNITED TO
SAVE OUR TREES

STATE OF ILLINOIS)
) ss.
COUNTY OF CHAMPAIGN)


Notary Public



Prepared by:
John McMahon
Wilkie & McMahon
8 E. Main St.
Champaign, IL 61820
Telephone: (217) 359-2115
Facsimile: (217) 359-2754
jmcma83890@aol.com

Illinois Power Company

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Proposed Vegetation Management Tariff)

Prepared by:
John McMahon
Wilkie & McMahon
8 E. Main St.
Champaign, IL 61820
Telephone: (217) 359-2115
Facsimile: (217) 359-2754
jmcma83890@aol.com

Service List for ICC Docket No. 01-0012

David Lincoln Ader
Attorney for Interveners
Ancel, Glink, Diamond, Bush, DiCianni & Rolek, P.C.
140 S. Dearborn St., Ste. 600
Chicago, IL 60603
ancel@ancelglink.com

Simone Byvoets
Commonwealth Edison Company
One Financial Place, 33rd Fl.
Chicago, IL 60604
simone.byvoets@ucm.com

Randy W. Clemens
Senior Attorney
Illinois Power Company
500 S. 27th St.
Decatur, IL 62521
randy_clemens@illnova.com

Joseph T. Clennon
Office of General Counsel
Illinois Commerce Commission
527 E. Capitol Av.
Springfield, IL 62701
jclennon@icc.state.il.us

Carrie J. Hightman
Atty. for Illinois Power Company
Schiff, Hardin & Waite
233 S. Wacker Dr.
6600 Sears Tower
Chicago, IL 60606
chightman@schiffhardin.com

Brian P. Mack
Atty. for Interveners
Ancel, Glink, Diamond, Bush, DiCianni & Rolek, P.C..
1409 S. Dearborn St., Ste. 600
Chicago, IL 60603

Chris Olsen
Vice President
Public And Regulatory Affairs
Illinois Power Company
500 S. 27th St.
Decatur, IL 62521-2200
chris_olsen@dynegy.com

Anne R. Pramaggiore
Associate General Counsel
Commonwealth Edison Company
One Financial Place, 33rd Fl.
Chicago, IL 60604
anne.pramaggiore@exeloncorp.com

E. Glenn Rippie
Atty. for Commonwealth Edison Company
Hopkins & Sutter
Three First National Plaza, Ste. 4100
Chicago, IL 60602
grippie@hopsut.com

W. Michael Seidel
Atty. for CILCO
Defrees & Fiske
200 S. Michigan Av., Ste. 1100
Chicago, IL 60604
wmseidel@defrees.com

Nick T. Shea
Director, Rates & Regulatory Affairs
Central Illinois Light Company
300 Liberty St.
Peoria, IL 61602
Nshea@cilco.com

Janis Von Qualen
Office of General Counsel
Illinois Commerce Commission
527 E. Capitol Av.
Springfield, IL 62701
jvonqual@icc.state.il.us

Miki Vucic
Atty. for Commonwealth Edison Company
Hopkins & Sutter
Three First National Plaza, Ste. 4100
Chicago, IL 60602
mvucic@hopsut.com